1	STEPHANIE M. HINDS (CABN 154284) United States Attorney			
2 3	THOMAS A. COLTHURST (CABN 99493) Chief, Criminal Division			
4	ADAM A. REEVES (NYBN 2363877) ROBERT S. LEACH (CABN 196191)			
5	Assistant United States Attorneys			
6	1301 Clay Street, Suite 340S Oakland, California 94612			
7 8	Telephone: (510) 637-3680 Fax: (510) 637-3724 Email: adam.reeves@usdoj.gov			
9	Attorneys for United States of America			
10	UNITED STAT	ES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA			
12	SAN FRANCISCO DIVISION			
13	UNITED STATES OF AMERICA,) Case No. 18-CR-577 CRB		
14	Plaintiff,) [PROPOSED] ORDER) AUTHORIZING RULE 17 SUBPOENAS		
15	v.) AUTHORIZING RULE 17 SUBFOENAS		
16	MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN,))		
17 18	Defendants.)))		
19		.)		
20	EOD COOD CAUGE CHOWN - G	haning and this matter and batch on Iron 2, 2022, the		
		hearing on this matter conducted on June 3, 2022, the		
21		on for Rule 17 Subpoenas dated November 15, 2021		
22	(Document 91), and ORDERS the issuance of R	Rule 17 subpoenas to the following seven (7) persons:		
23	(1) Corrado Broli; (2) Nicole Eagan; (3) Lisa Ha	urris; (4) Peter Menell; (5) Poppy Prentiss (aka Poppy		
24	Gustafsson); (6) Rob Sass; and (7) Gary Szukals	ki; the seven subpoenas shall use the form in Exhibits A		
25	through G attached hereto; and the subpoenas sh	all each have a return date of October 5, 2022.		
26	<i>//</i>			
27	<i>//</i>			
28	<i>//</i>			
	[PROPOSED] ORDER	1		

1	IT IS SO ORDERED.	
2		
3	DATED:	
4		THE HONORABLE CHARLES R. BREYER
5		United States District Judge
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Exhibit A

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

UNITED	STATES	OF A	MERI	ίCΑ.
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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO:

Corrado Broli

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequen by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you depart by the court or by an officer acting on behalf of the court.		
PLACE ✓ United States Courthouse United States Courthouse United States Courthouse	COURTROOM/JUDGE 17th Fl. Courtroom 6	
450 Golden Gate Avenue 280 South First Street 1301 Clay Street San Francisco, CA 94102 San Jose, CA 95113 Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00	
✓ You are also commanded to bring with you the following document(s) or object(s):		
Please produce all documents relating in any way to Count Seventeen (pages 13-15) of the attache Indictment in <i>United States v. Lynch and Chamberlain</i> , Case No. 18-CR-577 CRB, including all such or reference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett Packard ("HP"), Invoke Capital, employment, and any other possible benefits.	locuments that	
NOTE: Subpoena forms for the production of documents or objects at or in advance of the trial, hearing or proceeding at which the items are to be offered in evidence (CAND 89B, Subpoena to Produce Documents or Objects in a Criminal Case) or for the production of state law enforcement personnel or complaint records (CAND 89C, Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in Comminal Case) are available at the Court's Internet site: cand.uscourts.gov. U.S. MAGISTRATE JUDGE OR CLERK OF COURT DATE		
(By) Deputy Clerk O6/03/2022		

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SE	RVICE	
RECEIVED BY SERVER	DATE	PLACE
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SERVED ON (PR		FEES AND MILEAGE TENDERED TO WITNESS ☐ YES ☐ NO AMOUNT \$
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I declare under contained in the Executed on	e Proof of Service is true and correct.	ed States of America that the foregoing information
	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INF	ORMATION	

COUNT SEVENTEEN:

(18 U.S.C. § 371 – Conspiracy)

- 31. The allegations in Paragraphs 1 through 24 are realleged and incorporated as if fully set forth here.
- 32. Beginning in or about October 2011, and continuing until in or about November 2018, in the Northern District of California and elsewhere, the defendants,

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN,

and others, did knowingly conspire to commit offenses against the United States, namely (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505, and (d) engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

33. The objectives of the conspiracy were, among other things, to cover up, conceal, influence witnesses to, and otherwise obstruct investigations of the scheme to defraud set forth in Paragraphs 19 through 24 by, among other things, (a) falsifying, destroying, and stealing business records of HP, (b) altering, destroying, mutilating, and concealing records, documents, and objects with intent to impair their integrity and availability for use in official proceedings, (c) paying hush money and other benefits to influence, delay, and prevent the testimony of persons in official proceedings, (d) otherwise obstructing, influencing, and impeding official proceedings, and (e) laundering the proceeds of the Autonomy acquisition.

Overt Acts 1 In furtherance of the conspiracy and to effect the objects thereof, in the Northern District 2 34. of California and elsewhere, LYNCH, CHAMBERLAIN, and others committed the following overt 3 4 acts: On or about October 7, 2011, LYNCH transferred £100,000,000 from an account 5 a. at UBS to an account at HSBC Private Bank. 6 On or about October 7, 2011, LYNCH transferred £100,000,000 from an account 7 b. at UBS to an account at Barclay's Private Bank. 8 On or about October 7, 2011, LYNCH transferred £100,000,000 from an account 9 c. at UBS to an account at JP Morgan International Bank. 10 On or about October 7, 2011, LYNCH transferred £100,000,000 from an account d. 11 at UBS to an account at Merrill Lynch Portfolio Managers. 12 On or about February 3, 2012, CHAMBERLAIN and Hussain directed an HP 13 e. finance employee to falsely record approximately \$5.5 million in revenue to be included in HP's 14 financial statements for the period ending January 31, 2012. 15 In or about May 2012, Hussain instructed an HP executive to falsify a revenue f. 16 forecast. 17 In or about May 2012, a co-conspirator caused the destruction of hard drives in 18 g. HP's Cambridge office. 19 强. In or about May 2012, a co-conspirator instructed an HP employee to erase 20 CHAMBERLAIN's laptop computer and any backup. 21 In or about May 2012, a co-conspirator attempted to remove the laptop of another i. 22 co-conspirator from HP's offices. 23 On or about June 1, 2012, LYNCH transferred £20,000,000 from an account at į. 24 UBS to an account at Merrill Lynch Portfolio Managers. 25 On or about July 6, 2012, LYNCH caused the incorporation of ICP London k. 26 Limited ("Invoke") in the British Virgin Islands. LYNCH used Invoke and entities affiliated with 27 Invoke as a means to pay former Autonomy employees, including Hussain. 28

Case 3:18-er-00577-CRB Decument 221 Ffille 096/07/32 PRagers of 26

٠,۱	1. On or about July 29, 2012, in all interview with counsel for HF, L I NCH made
2	false and misleading statements to counsel for HP.
3	m. In or around January 2013, and thereafter, LYNCH refused to return books and
4	records and other property belonging to HP.
5	n. In or about February 2013, a co-conspirator stole HP's confidential information
6	by uploading thousands of documents from her company laptop to a USB device/pen drive, in violation
7	of HP's policies and internal controls. The co-conspirator subsequently provided some or all of the
8	documents to LYNCH and Hussain.
9	o. In or around May 2016, LYNCH caused an Invoke affiliate to hire
10	CHAMBERLAIN.
11	p. On or about February 19, 2018, LYNCH purchased shares of an Invoke affiliate
12	from Hussain for approximately \$3.5 million.
13	q. On or about June 27, 2018, LYNCH purchased shares of an Invoke affiliate from
14	Hussain for approximately \$730,000.
15	In violation of Title 18, United States Code, Section 371.
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	SUPERSEDING INDICTMENT 15

Exhibit B

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: NT: 2010 E

Nicole Eagan		
YOU ARE COMMANDED to appear at the place, date, and time by the court, to testify in the above-referenced case. This subpodepart by the court or by an officer acting on behalf of the court	ena shall remain in effect until	
PLACE ✓ United States Courthouse ☐ United States Courthouse	☐ United States Courthouse	COURTROOM/JUDGE 17th Fl. Courtroom 6
450 Golden Gate Avenue 280 South First Street San Francisco, CA 94102 San Jose, CA 95113	1301 Clay Street Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00
You are also commanded to bring with you the following do Please produce all documents relating in any way to Count Sever Indictment in <i>United States v. Lynch and Chamberlain</i> , Case No. reference Michael Lynch, Steven Chamberlain, Autonomy, Hewler employment, and any other possible benefits.	nteen (pages 13-15) of the attac 18-CR-577 CRB, including all suc	h documents that
NOTE: Subpoena forms for the production of documents or obje which the items are to be offered in evidence (CAND 89B, Subp Case) or for the production of state law enforcement personnel of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Complain Recail in Conduction of State Law Enforcement Personnel Or Conduction of State Law Enforcement Personnel Or Conduction Or Conduction (Conduction Personnel Or Conduction Personnel Or Conduction Personnel Or Conduction Or Conduction (Conduction Person	poena to Produce Documents or or complaint records (CAND 890 piminal Case) are available at the	Objects in a Criminal S, Subpoena to Produce

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds **United States Attorney**

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SE	ERVICE	
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ADDITIONAL IN	FORMATION	

COUNT SEVENTEEN:

(18 U.S.C. § 371 - Conspiracy)

- 31. The allegations in Paragraphs 1 through 24 are realleged and incorporated as if fully set forth here.
- 32. Beginning in or about October 2011, and continuing until in or about November 2018, in the Northern District of California and elsewhere, the defendants,

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN,

and others, did knowingly conspire to commit offenses against the United States, namely (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505, and (d) engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

33. The objectives of the conspiracy were, among other things, to cover up, conceal, influence witnesses to, and otherwise obstruct investigations of the scheme to defraud set forth in Paragraphs 19 through 24 by, among other things, (a) falsifying, destroying, and stealing business records of HP, (b) altering, destroying, mutilating, and concealing records, documents, and objects with intent to impair their integrity and availability for use in official proceedings, (c) paying hush money and other benefits to influence, delay, and prevent the testimony of persons in official proceedings, (d) otherwise obstructing, influencing, and impeding official proceedings, and (e) laundering the proceeds of the Autonomy acquisition.

1 Overt Acts In furtherance of the conspiracy and to effect the objects thereof, in the Northern District 2 34. of California and elsewhere, LYNCH, CHAMBERLAIN, and others committed the following overt 3 4 acts: On or about October 7, 2011, LYNCH transferred £100,000,000 from an account 5 a. at UBS to an account at HSBC Private Bank. 6 On or about October 7, 2011, LYNCH transferred £100,000,000 from an account 7 b. at UBS to an account at Barclay's Private Bank. 8 On or about October 7, 2011, LYNCH transferred £100,000,000 from an account 9 c. at UBS to an account at JP Morgan International Bank. 10 On or about October 7, 2011, LYNCH transferred £100,000,000 from an account d. 11 at UBS to an account at Merrill Lynch Portfolio Managers. 12 On or about February 3, 2012, CHAMBERLAIN and Hussain directed an HP 13 e. finance employee to falsely record approximately \$5.5 million in revenue to be included in HP's 14 financial statements for the period ending January 31, 2012. 15 In or about May 2012, Hussain instructed an HP executive to falsify a revenue f. 16 forecast. 17 In or about May 2012, a co-conspirator caused the destruction of hard drives in 18 g. HP's Cambridge office. 19 强. In or about May 2012, a co-conspirator instructed an HP employee to erase 20 CHAMBERLAIN's laptop computer and any backup. 21 In or about May 2012, a co-conspirator attempted to remove the laptop of another i. 22 co-conspirator from HP's offices. 23 On or about June 1, 2012, LYNCH transferred £20,000,000 from an account at į. 24 UBS to an account at Merrill Lynch Portfolio Managers. 25 On or about July 6, 2012, LYNCH caused the incorporation of ICP London k. 26 Limited ("Invoke") in the British Virgin Islands. LYNCH used Invoke and entities affiliated with 27 Invoke as a means to pay former Autonomy employees, including Hussain. 28

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SUPERSEDING INDICTMENT

- 1		
1	1.	On or about July 29, 2012, in an interview with counsel for HP, LYNCH made
2	false and misleading	statements to counsel for HP.
3	m.	In or around January 2013, and thereafter, LYNCH refused to return books and
4	records and other pro	operty belonging to HP.
5	n.	In or about February 2013, a co-conspirator stole HP's confidential information
6	by uploading thousar	nds of documents from her company laptop to a USB device/pen drive, in violation
7	of HP's policies and	internal controls. The co-conspirator subsequently provided some or all of the
8	documents to LYNC	H and Hussain.
9	0.	In or around May 2016, LYNCH caused an Invoke affiliate to hire
10	CHAMBERLAIN.	
11	p.	On or about February 19, 2018, LYNCH purchased shares of an Invoke affiliate
12	from Hussain for app	proximately \$3.5 million.
13	q.	On or about June 27, 2018, LYNCH purchased shares of an Invoke affiliate from
14	Hussain for approxin	nately \$730,000.
15	In violation o	f Title 18, United States Code, Section 371.
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	SUPERSEDING INI	DICTMENT 15

Exhibit C

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

UNITED	STATES	OF A	MERI	ίCΑ.
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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

Lisa Harris

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you depart by the court or by an officer acting on behalf of the court.	
PLACE ☑ United States Courthouse □ United States Courthouse □ United States Courthouse	COURTROOM/JUDGE 17th Fl. Courtroom 6
450 Golden Gate Avenue280 South First Street1301 Clay StreetSan Francisco, CA 94102San Jose, CA 95113Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00
You are also commanded to bring with you the following document(s) or object(s): Please produce all documents relating in any way to Count Seventeen (pages 13-15) of the attached Indictment in <i>United States v. Lynch and Chamberlain</i> , Case No. 18-CR-577 CRB, including all such direference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett Packard ("HP"), Invoke Capital, I employment, and any other possible benefits.	ocuments that
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(By) Deputy Clerk ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:	

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds **United States Attorney**

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SE	ERVICE	
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	ne Proof of Service is true and correct.	nited States of America that the foregoing information
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COUNT SEVENTEEN:

(18 U.S.C. § 371 - Conspiracy)

- 31. The allegations in Paragraphs 1 through 24 are realleged and incorporated as if fully set forth here.
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and others, did knowingly conspire to commit offenses against the United States, namely (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505, and (d) engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

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6	by uploading thousands of documents from her company laptop to a USB device/pen drive, in viola	tion
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	SUPERSEDING INDICTMENT 15	

Exhibit D

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

UNITED	STATES	OF A	MERI	ίCΑ.
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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Peter Menell

YOU ARE COMMANDED to appear at the place, date, and time by the court, to testify in the above-referenced case. This subpo- depart by the court or by an officer acting on behalf of the cour	oena shall remain in effect until y	
PLACE ✓ United States Courthouse ☐ United States Courthouse	☐ United States Courthouse	COURTROOM/JUDGE 17th Fl. Courtroom 6
450 Golden Gate Avenue 280 South First Street San Francisco, CA 94102 San Jose, CA 95113	1301 Clay Street Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00
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NOTE: Subpoena forms for the production of documents or obj which the items are to be offered in evidence (CAND 89B, Subp Case) or for the production of state law enforcement personnel of State Law Enforcement Personnel Or Complaint Recail in a Cand.uscourts.gov. U.S. MAGISTRATE JUDGE OR CLERK OF COURT (By) Deputy Clerk	poena to Produce Documents or Cor complaint records (CAND 89C piminal Case) are available at the	Objects in a Criminal , Subpoena to Produce

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds **United States Attorney**

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE	
RECEIVED BY SERVER	PLACE
SERVED DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS YES NO AMOUNT \$
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contained in the Proof of Service is Executed on	
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	ADDRESS:
ADDITIONAL INFORMATION	

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(18 U.S.C. § 371 - Conspiracy)

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- 32. Beginning in or about October 2011, and continuing until in or about November 2018, in the Northern District of California and elsewhere, the defendants,

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN,

and others, did knowingly conspire to commit offenses against the United States, namely (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505, and (d) engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

33. The objectives of the conspiracy were, among other things, to cover up, conceal, influence witnesses to, and otherwise obstruct investigations of the scheme to defraud set forth in Paragraphs 19 through 24 by, among other things, (a) falsifying, destroying, and stealing business records of HP, (b) altering, destroying, mutilating, and concealing records, documents, and objects with intent to impair their integrity and availability for use in official proceedings, (c) paying hush money and other benefits to influence, delay, and prevent the testimony of persons in official proceedings, (d) otherwise obstructing, influencing, and impeding official proceedings, and (e) laundering the proceeds of the Autonomy acquisition.

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2	2 false and misleading statements to counsel for HP.	
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8	8 documents to LYNCH and Hussain.	
9	o. In or around May 2016, LYNCH caused an Invoke affiliat	te to hire
10	10 CHAMBERLAIN.	
11	p. On or about February 19, 2018, LYNCH purchased shares	of an Invoke affiliate
12	12 from Hussain for approximately \$3.5 million.	
13	q. On or about June 27, 2018, LYNCH purchased shares of a	ın Invoke affiliate from
14	14 Hussain for approximately \$730,000.	
15	In violation of Title 18, United States Code, Section 371.	
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Exhibit E

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

UNITED	STATES	OF A	MERI	ίCΑ.
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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO:

Poppy Prentiss (aka Poppy Gustafsson)

450 Golden Gate Avenue San Francisco, CA 94102	280 South First Street		United States Courthouse	17th Fl. Courtroom 6
	San Jose, CA 95113		1301 Clay Street Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00
✓ You are also commanded to b	oring with you the following do	cume	nt(s) or object(s):	
employment, and any other possion. NOTE: Subpoena forms for the possion which the items are to be offered.	production of documents or object			
Case) or for the production of sta	te law enforcement personnel or	com	plaint records (CAND 89C, A	Subpoena to Produce
State Law Enforcement Personne cand.uscourts.gov.	l Or Completin Recipin &	imino	al Case) are available at the C	Court's Internet site:
U.S. MAGISTRATE JUDGE OR CLER	K OF COURT DAT	E	06/03/2022	

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

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	DECLARATIO	ON OF SERVER
I declare under contained in the Executed on	e Proof of Service is true and correct.	ed States of America that the foregoing information
	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INF	ORMATION	

COUNT SEVENTEEN:

(18 U.S.C. § 371 - Conspiracy)

- 31. The allegations in Paragraphs 1 through 24 are realleged and incorporated as if fully set forth here.
- 32. Beginning in or about October 2011, and continuing until in or about November 2018, in the Northern District of California and elsewhere, the defendants,

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and others, did knowingly conspire to commit offenses against the United States, namely (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505, and (d) engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

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	SUPERSEDING INDICTMENT 15

Exhibit F

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO:

	United States Courthouse	COURTROOM/JUDGE 17th Fl. Courtroom 6
	1301 Clay Street Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00
. 18-CR	-577 CRB, including all such o	documents that
<i>poena</i> or com	to Produce Documents or Obplaint records (CAND 89C,	jects in a Criminal Subpoena to Produce
	ocume enteen 18-CR lett Pa ects at poena ior com	United States Courthouse 1301 Clay Street Oakland, CA 94612 ocument(s) or object(s): enteen (pages 13-15) of the attache 18-CR-577 CRB, including all such of lett Packard ("HP"), Invoke Capital, ects at or in advance of the trial, her opena to Produce Documents or Object complaint records (CAND 89C, Siminal Case) are available at the Case

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds **United States Attorney**

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SE	RVICE	
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SERVED	DATE	PLACE
SERVED ON (PR		FEES AND MILEAGE TENDERED TO WITNESS ☐ YES ☐ NO AMOUNT \$
SERVED BY (PRI	NT NAME)	TITLE
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I declare under contained in the Executed on	e Proof of Service is true and correct.	ed States of America that the foregoing information
	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INF	ORMATION	

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Exhibit G

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

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SUBPOENA TO PRODUCE DOCUMENTS OR OBJECTS IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

Gary Szukalski

YOU ARE COMMANDED to appear at the place, date, a by the court, to testify in the above-referenced case. The depart by the court or by an officer acting on behalf of	nis subpoena sh		
PLACE ✓ United States Courthouse United States Courthouse		United States Courthouse	COURTROOM/JUDGE 17th Fl. Courtroom 6
450 Golden Gate Avenue 280 South First Str San Francisco, CA 94102 San Jose, CA 9511		1301 Clay Street Oakland, CA 94612	DATE AND TIME 10/5/2022 09:00
✓ You are also commanded to bring with you the foll	lowing documer	nt(s) or object(s):	
Please produce all documents relating in any way to Co Indictment in <i>United States v. Lynch and Chamberlain</i> , Coreference Michael Lynch, Steven Chamberlain, Autonor employment, and any other possible benefits.	Case No. 18-CR-	577 CRB, including all such	documents that
NOTE: Subpoena forms for the production of documen which the items are to be offered in evidence (CAND & Case) or for the production of state law enforcement State Law Enforcement Personnel Or Complain Recand.uscourts.gov.	9B, <i>Subpoena to</i> recomplet or comp	o Produce Documents or Obolaint records (CAND 89C,	bjects in a Criminal Subpoena to Produce
U.S. MAGISTRATE JUDGE OR CLERK OF COURT (By) Deputy Clerk	DATE	06/03/2022	
ATTODNEY'S NAME ADDDESS AND BHONE NIL	MDED		

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney

U.S. Attorney's Office

450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application of the United States of America

Stephanie M. Hinds **United States Attorney**

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SE	RVICE	
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I declare under contained in the Executed on	e Proof of Service is true and correct.	ed States of America that the foregoing information
	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INF	ORMATION	

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	SUPERSEDING INDICTMENT 15